

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION**

KARL KENDALL, SUZANNE RAINEY  
and VINCENZO PERNICE, individually and on  
behalf of those similarly situated,

Plaintiffs,

v.

PHARMACEUTICAL PRODUCT  
DEVELOPMENT, LLC, BOARD OF  
DIRECTORS OF PHARMACEUTICAL  
PRODUCT DEVELOPMENT, LLC, THE  
BENEFITS ADMINISTRATIVE COMMITTEE,  
and JOHN DOES 1-30.

Defendants.

Civil Action No. 7:20-cv-00071-D

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES AND NAMED PLAINTIFFS'  
CASE CONTRIBUTION AWARDS**

Named Plaintiffs Karl Kendall, Suzanne Rainey, and Vincenzo Pernice (collectively, "Plaintiffs"), participants in the Pharmaceutical Product Development, LLC Retirement Savings Plan (the "Plan") hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting class counsel attorneys' fees in the amount of \$258,307.50 which represents 33 1/3% of the settlement amount;
2. Directing reimbursement to Class Counsel in the amount of \$22,344.52 of expenses incurred in the prosecution of the action;
3. Awarding case contribution award of \$10,000 to each of the four Named Plaintiffs (Karl Kendall, Suzanne Rainey, and Vincenzo Pernice); and
4. For such other relief as the Court may deem just and proper.

A proposed form of Order is submitted hereto.

The grounds for this Motion are set forth in the following documents filed contemporaneously herewith:

A. Memorandum of Law in Support of Plaintiffs' Motion For Award of Attorneys' Fees and Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs;

B. Declaration of Mark K. Gyandoh in Support of Plaintiffs' Motion for Final Approval of Settlement and In Support of Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards for the Named Plaintiffs;

C. Declaration of Named Plaintiff Karl Kendall in Support of Plaintiffs' Motion for Final Approval of Settlement and In Support of Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards for the Named Plaintiffs;

D. Declaration of Named Plaintiff Suzanne Rainey In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs; and

E. Declaration of Named Plaintiff Vincenzo Pernice In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs.

Dated: July 26, 2022

Respectfully submitted,

**CAPOZZI ADLER, P.C.**

/s/ Mark K. Gyandoh

Mark K. Gyandoh, Esquire

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Counsel for Plaintiffs and  
the Putative Class

**CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2022, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh  
Mark K. Gyandoh, Esq.